

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re:

MAXWELL CLARK
SABRINA CLARK
Debtor(s).

Case No. 23-10693-j13

RESPONSE TO MOTION TO DISMISS

COMES NOW, the Debtors, Maxwell Clark and Sabrina Clark, by and through Counsel, Jason Cline, LLC (Jason M. Cline) and hereby responds to the Chapter 13 Trustee's Motion to Dismiss (Doc. No. 46) filed on December 9, 2024 and as grounds therefore states as follows:

1. The Trustee filed the Motion to Dismiss due to Debtor failing to file operating reports.
2. Debtor, Maxwell Clark, is no longer self employed and will be filing an affidavit stating this and an amended schedule I to reflect his employment.

WHEREFORE, Debtors request that the Motion to Dismiss be denied, and for such other and further relief as the Court deems just and proper.

Respectfully Submitted,

JASON CLINE, LLC

/s/ Jason M. Cline electronically submitted

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CERTIFICATE OF SERVICE

I, Jason M. Cline, hereby certify that on December 30, 2024, a true and correct copy of the foregoing was filed electronically with the Bankruptcy Court in accordance with the CM/ECF system filing procedures for providing electronic service to the parties of record identified with the Bankruptcy Court.

/s/ Jason M. Cline "Electronically Signed"
Jason M. Cline